

## Newhaven School : Child Protection Policy 2025 - 2026

**Date of Last Review:** July 2025

**Agreed by Governors:** to be agreed at Management Committee Meeting

**Staff training on policy:** 1st September 2025

**Frequency of Review:** Annually or more frequently

**Date of Next Review:** July 2026

**Staff management Committee:**

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## Contents

### Child Protection Statement

We recognise our moral and statutory responsibility to safeguard and promote the welfare of all pupils. This is particularly important in our school as we know that abuse of our cohort is significantly higher than national averages. We are also mindful that we do not miss abusive and dangerous behaviour due to our high levels of exposure to it and that we treat each concern very seriously. We also encourage a culture of listening to children and taking account of their wishes and feelings in any measures we put in place to protect them. We endeavour to provide a safe and welcoming environment where children are respected and valued by recognising the risks of failing to take the right action at the right time and ensuring we:

1. Act on and refer the early signs of abuse, neglect and exploitation.
2. Listen to the views of the child.
3. Keep detailed and accurate records.
4. Monitor and re-address concerns where situations do not improve.
5. Share information promptly and appropriately.
6. Challenge those who do not appear to be taking any or appropriate action.

The policy provides information regarding different types of abuse, links to statutory and non-statutory documentation and outlines our procedures which ensure our children receive effective support, protection and justice.

### Introduction

The procedures outlined in this policy apply to all staff (including temporary, voluntary, and permanent staff) and management committee members. They are consistent with the guidance and procedures of the **Greenwich Safeguarding Children Partnership (GSCP)**:

<https://greenwichsafeguardingchildren.org.uk/> and with locally agreed safeguarding procedures.

Newhaven School takes its responsibility to protect and safeguard children very seriously and follows the statutory guidance set out in **Working Together to Safeguard Children (2023)** and **Keeping Children Safe in Education (KCSIE, September 2025)**:

[https://assets.publishing.service.gov.uk/media/68add931969253904d155860/Keeping\\_children\\_safe\\_in\\_education\\_from\\_1\\_September\\_2025.pdf](https://assets.publishing.service.gov.uk/media/68add931969253904d155860/Keeping_children_safe_in_education_from_1_September_2025.pdf)

In addition, the school adheres to other relevant national legislation, statutory guidance, and local safeguarding protocols as published by the **Greenwich Safeguarding Children Partnership (GSCP)**.

The school is committed to supporting pupils' understanding of how to stay safe online, in line with the Department for Education guidance, *Teaching Online Safety in Schools* (June 2019). Pupils are also supported in developing personal safety awareness through the broad curriculum offer, including the **RSHE curriculum**, ensuring that safeguarding education is embedded across learning opportunities.

## Legislation and Statutory Guidance

This policy is based on the following legislation and statutory guidance, in line with Keeping Children Safe in Education (KCSIE, September 2025):

- Section 175 of the Education Act 2002, which places a duty on schools and local authorities to safeguard and promote the welfare of pupils.
- The School Staffing (England) Regulations 2009, which require schools to maintain a single central record and ensure that at least one person involved in recruitment is trained in safer recruitment practices.
- The Children Act 1989 and 2004 amendment, providing a framework for the care and protection of children.
- Female Genital Mutilation Act 2003, Section 5B(11) (as amended by the Serious Crime Act 2015), placing a statutory duty on teachers to report to the police where they discover that FGM appears to have been carried out on a girl under 18.
- Statutory guidance on FGM, outlining responsibilities for safeguarding and supporting girls affected by FGM.
- The Rehabilitation of Offenders Act 1974, which sets out the circumstances under which people with criminal convictions may work with children.
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines 'regulated activity' in relation to children.
- Counter-Terrorism and Security Act 2015 (Prevent duty), supported by statutory guidance, which explains schools' responsibilities to protect pupils from radicalisation and extremism.
- Children and Social Work Act 2017, which includes statutory duties relating to child safeguarding practice reviews and information sharing.
- Working Together to Safeguard Children (2023), which provides statutory guidance on inter-agency safeguarding arrangements.
- KCSIE 2025, which sets out statutory duties for all school staff regarding child protection, including early help, peer-on-peer abuse, online safety, mental health, and the identification of vulnerable groups.

Other relevant guidance includes local procedures published by the Greenwich Safeguarding Children Partnership (GSCP): <https://www.greenwichsafeguardingchildren.org.uk>.

## Context

Newhaven School has a cohort of students who are particularly vulnerable to abuse, neglect, and exploitation. Many students have experienced trauma, making them especially susceptible to grooming and other forms of exploitation. In line with local priorities set by GSCP, the school pays particular attention to safeguarding children affected by the 'toxic trio' of domestic abuse, parental mental ill-health, and substance misuse, as well as neglect, child sexual exploitation, harmful sexual behaviours, and gang-related activity.

National safeguarding priorities are also considered, including: child sexual exploitation, peer-on-peer abuse, online safety, radicalisation, and female genital mutilation. Guidance and resources for staff in all these areas are available via the GSCP website: <https://www.greenwichsafeguardingchildren.org.uk>.

## **Purpose and Aims**

**1.1** Newhaven School fully recognises its responsibilities for safeguarding children including those in need of protection. Our policy applies to all staff, management committee, volunteers and other adults working in the school and aims to ensure consistent good practice across the school and demonstrate our commitment to protecting children.

## **Principles and values**

- Children have a right to feel secure and cannot learn effectively unless they do.
- All children have a right to be protected from harm.
- All staff, volunteers and governors have a key role in prevention of harm and an equal responsibility to act on any suspicion or disclosure that may indicate a child is at risk of harm, either in the school or in the community, taking into account *contextual safeguarding*, in accordance with the guidance.
- We acknowledge that working in partnership with other agencies protects children and reduces risk and so we will engage in partnership working throughout the child protection process to safeguard children.
- Whilst the school will work openly with parents and carers as far as possible, it reserves the right to contact Children's Social Care or the police, without notifying parents if this is believed to be in the child's best interests

*There are five main elements to our policy:*

**Safer Recruitment:** Ensuring we practise safe recruitment in line with national legislation by using at least one suitably trained recruiter on all interview panels and by checking the suitability of staff and volunteers to work with children and ensuring any unsuitable behaviour is reported and managed using the allegations management procedures.

**Prevention:** By creating a positive school atmosphere where students are encouraged to talk and maintaining the thought in all staff that it could happen here. We also carry out risk assessments of students where necessary, risk assessing educational visits and ensure a suitably trained workforce. We also ensure that students understand the nature of safeguarding risks through the RSHE and e-safety curricula, targeted assemblies and outside groups.

**Working with pupils:** Raising awareness of child protection issues and equipping children with the skills needed to keep them safe by ensuring they know the identity of the DSLs, making sure that students have access to adults in the school including pastoral managers and tutors at King's Park, NEST and Gardens, Course Lead at the Supported Internship and teachers and Head of Outreach within the Outreach provision. Also, we ensure children are listened to through the school council.

**Protection:** By ensuring that all staff follow the procedures outlined in this policy and that they are trained and supported appropriately and sensitively in safeguarding matters.

**Support:** (to pupils and staff, including those who are survivors of abuse). We support students who have been abused in accordance with their child protection plans and carry out all actions agreed with other professionals that ensure the safety and appropriate development of students.

We are particularly alert to the potential need for early help for children who:

- Are disabled and have additional educational needs.
- Have special educational needs.
- Are young carers
- Show signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups.
- Are frequently missing or go missing from care or a care home
- Are at risk of modern slavery or trafficking
- Are at risk of being groomed and are susceptible to being radicalised or exploited
- Are in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- Are misusing drugs or alcohol themselves
- Have returned home from care
- Are privately fostered

With regards to children with identified SEND including but not exclusive to those with EHCPs and particularly with regard to the large cohort at the school with ASD diagnoses, staff should be aware of the additional safeguarding needs presented by them.

Key elements are:

- We do not assume that indicators of possible abuse such as behaviour, mood or injury are related to the child's SEN.
- We are aware that students with SEN may be severely impacted by behaviours such as bullying without showing any outward signs.
- We provide opportunities for all students to communicate their needs and concerns and that may take additional strategies such as talking mats and comic strip conversations.
- That we are aware that there is a risk of overreliance on parents as experts.

**1.2** We are also acutely aware that children can abuse their peers. Staff should raise concerns in this area as soon as they have them and never dismiss abusive behaviours

## **Intentions**

**2.1.** Newhaven School will;

- Ensure all staff and volunteers understand their responsibilities in being alert to the signs of abuse and responsibility for referring any concerns to the DSL or a deputy DSL.
- Ensure that all visitors to the school are aware of safeguarding procedures within the school by issuing them a leaflet outlining key staff and procedures on arrival at the school.
- Ensure there is a comprehensive induction policy in place specifically outlining the school Safeguarding/CP policy; the staff code of conduct; acceptable use (ICT including mobile

phones and cameras); school behaviour policy; the safeguarding response to children who go missing from education, Prevent and identity and role of the DSL;

- Ensure all staff are trained to alert the safeguarding Team via CPOMS
- Ensure all staff and volunteers understand their responsibilities in being alert to the signs of abuse and responsibility for referring any concerns to the DSL and have signed that they have read Keeping Children Safe in Education (September 2025) Part 1
- Ensure that parents have an understanding of the responsibility placed on the school and staff for child protection by setting out its obligations in any school prospectus and on the website.
- Notify Social Care immediately and timely if there is an unexplained absence of a child on a Child Protection Plan
- Contact the child's social worker directly if there is an unexplained absence of a child who is Looked After. This may then trigger actions identified in the "Joint Police and Social Care Protocol for Dealing with Children Missing from Care"
- Develop effective links with relevant agencies and co-operate as required with their enquiries regarding child protection matters including attendance at case conferences
- Keep detailed, accurate, secure records of concerns about children via CPOMS, even where there is no need to refer the matter immediately
- Ensure all safeguarding and child protection records are kept securely, separate from the main pupil file, and in locked appropriate locations via CPOMS
- Follow the procedures set out in this document, if an allegation is made against a member of SLT, staff or volunteer.
- Ensure safe recruitment practices are always followed.
- Ensure clear protocols are in place for the appropriate supervision of visitors (including visiting speakers/educators) and that the school's values and British Values are upheld.
- Have procedures in place to gather and respond to the views and/or concerns of pupils
- Seek to hold more than one emergency contact number for each pupil

### **Promoting a culture of Safeguarding and Training**

**3.1** The Head Teacher will undertake training on Child Protection to Level 2 at least every 2 years or as and when required by new legislation and guidance.

**3.2** The DSL will attend the GSCP Level 2 "Working Together to Safeguard Children" training and Prevent Training and then undertake refresher safeguarding training at least every two years.

**3.3** The Deputy DSLs and CP admin officers will also attend training to at least level 2 on a two yearly basis

**3.4** Any newly appointed DSL will attend the GSCP Level 2 "Working Together to Safeguard Children" training and the local DSL training before taking lead responsibility for safeguarding. A deputy DSL will take the lead role on safeguarding for the short time that the DSL is waiting to receive training

**3.5** The designated Management Committee member for Safeguarding and Child Protection will undertake governor safeguarding training annually.

**3.6** All members of staff will receive regular training on child protection and safeguarding annually, refresh PREVENT awareness yearly and receive regular updates through email or staff meetings from the DSL.

**3.7** All staff should identify students where they are concerned that they might need early help. This means that there are concerns but that these don't necessarily meet the thresholds for child protection incidents. These concerns should be raised in daily debriefs, with pastoral manager or via CPOMS and the DSL or a deputy DSL alerted immediately if required via a conversation (see appendix).

**3.8** All new members of staff will receive child protection training and CPOMS training from the DSL/Safeguarding leads as part of their induction programme

**3.9** Briefings and updates on child protection and safeguarding procedures will be provided by the DSL on a regular basis, at least annually, but more frequently when necessary, to ensure that all members of staff are familiar with any changes to the school policy or in the national guidance materials as they occur.

**3.10** The Head Teacher and DSL will assure that at least one member of every appointments panel will have gained accreditation through Safer Recruitment training.

**3.11** The DSL will retain a training record indicating the attendance at safeguarding training so that absent staff can receive an update on their return. Additionally, the DSL will retain a record showing staff have read Keeping Children Safe in Education (September 2023) Part 1.

### **The Head Teacher's Roles and Responsibilities**

**4.1** The Head Teacher should read and understand 'Keeping Children Safe in Education' and ensure that it is followed by the Designated Safeguarding Lead and all other staff.

**4.2** The Head teacher should ensure that the policies and procedures relating to safeguarding, adopted by the management committee, particularly concerning referrals of cases of suspected abuse, neglect and exploitation, are followed by all staff.

**4.3** The Head Teacher should ensure that the DSL, all deputy DSLs and the admin staff handling safeguarding information are trained to the appropriate level and frequency.

**4.4** To ensure that the designated safeguarding lead and any deputies should liaise with the local authority and work with other agencies in line with Working together to safeguard children.

**4.5** To ensure that the school has appropriate safeguarding responses to children who go missing in education (CME), particularly on repeat occasions.

**4.6** To ensure children are taught about safeguarding, including Online and Relationship and Sex Education (RSE), through teaching and learning opportunities, as part of providing a broad and balanced curriculum through the areas of RHSE and ICT as well as other opportunities.

**4.7** To ensure that the schools ICT systems are protected from potentially harmful and inappropriate material online through appropriate filtering and monitoring systems and appropriate monitoring and filtering are in place, including staff understanding of how monitoring and filtering works within the school

**4.8** Induction procedures are robust and meet the requirements outlined in KCSIE 2025

**4.9** Procedures are in place to refer to DBS any person dismissed or removed due to safeguarding concerns, including Agency Staff

**4.10** The school is satisfied that any alternative provider used by the school has appropriate safeguarding procedures in place via regular checks and review via the SLT responsible for Business Management

**4.11** The school curriculum provides regular opportunities for children to learn about personal safety and how to protect themselves from harm in an age appropriate way.

### **The Designated Safeguarding Lead and Deputy DSLs Roles & Responsibilities**

**5.1** All staff members should receive appropriate safeguarding and child protection training (including CPOMS training, yearly PREVENT training and refreshers) which is regularly updated and at least annually. In addition all staff members should receive safeguarding and child protection updates (for example, via email, e-bulletins and staff meetings), as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.

**5.2** To ensure they have updated DSL training to level 2 at least every 2 years and that deputy DSLs have the same.

**5.3** To oversee all Child Protection referrals to the Greenwich MASH Team.

**5.4** To ensure that either the DSL or a deputy DSL are always available during school hours for staff to discuss safeguarding concerns. This may be by telephone.

**5.5** At Newhaven, whilst there are several (see above) deputy DSLs, the ultimate lead responsibility for safeguarding and child protection remains with the designated safeguarding lead (DSL)

**5.6** Deputy DSLs can carry out any of the functions of the DSL under their supervision.

**5.6a** Liaising with the Headteacher ( or another designated Deputy DSL) to inform them of any safeguarding issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This includes being aware of the requirement for children to have an Appropriate Adult (PACE Code C 2019)  
<https://www.gov.uk/government/publications/pace-code-c-2019/pace-code-c-2019-accessible>

**5.7** The DSL chairs a four weekly meeting (the Pastoral Review Team) with all DSLs as possible but at least where a Safeguarding Lead from Gardens, NEST and Kings Park are present. At this meeting all children with active social care involvement, early help intervention or active safeguarding concerns are discussed and actions agreed and recorded via CPOMS

**5.8** If a child is categorised as a concern or has early help intervention then the DSL should ensure that they are kept under constant review and referred to children's social care if necessary. A concern includes children with historic social care intervention or children where staff are worried that they may but they don't yet meet thresholds for early help or social care intervention.

**5.9** Liaise as appropriate with staff, including IT technician, the SENCOs, the designated teacher for LAC, the virtual headteacher and Pastoral Leads/ Head of Campus in regards to mental health

**5.10** If, after a referral, the child's situation does not appear to be improving, the designated safeguarding lead (or the person who made the referral) as directed by the DSL should press children's services for reconsideration to ensure their concerns have been addressed and, most importantly, that the child's situation improves.

**5.11** If the school disagrees with a decision made by children's social care, this is discussed at the Pastoral Review Team meeting, and then the Greenwich Safeguarding Children's Partnership escalation policy may be used to challenge the decision.

**5.12** If the DSL discovers in the course of their work that an act of Female Genital Mutilation appears to have been carried out on a girl under the age of 18 then they must report it to the police.

**5.13** Further guidance on specific issues should be sought from

<https://www.greenwichsafeguardingchildren.org.uk/>

<https://www.greenwichsafeguardingchildren.org.uk/about-us/greenwich-safeguarding-children-partnership/>

**5.14** Ensure all staff are aware of the guidance 'What to do if you're worried a Child is being Abused'; [https://assets.publishing.service.gov.uk/media/5a80597640f0b62302692fa1/What\\_to\\_do\\_if\\_you\\_re\\_worried\\_a\\_child\\_is\\_being\\_abused.pdf](https://assets.publishing.service.gov.uk/media/5a80597640f0b62302692fa1/What_to_do_if_you_re_worried_a_child_is_being_abused.pdf) Feedback and reassure staff who have raised a child protection concern.

**5.15** Be able to keep detailed, accurate, secure records of referrals and/or concerns via CPOMS and regularly review via reports.

**5.16** Maintain an up-to-date awareness of safeguarding developments and distribute these as appropriate to all staff in line with advice from the Greenwich Safeguarding Children's Partnership (GSCP);

**5.17** Have attended Prevent Awareness training Prevent Education Officer RBG (0208 921 8325) or completed the PREVENT yearly refresher course via Government website

**5.18** Ensure the establishment's child protection policy and procedures are updated and reviewed annually and work with the governing body, management committee or proprietor regarding this

**5.19** Ensure parents can see copies of the child protection policy and procedures which alerts them to the fact that referrals about suspected abuse or neglect may be made and the role of the establishment in this. (Schools may want to consider devising a parent/child friendly CP summary policy);

**5.20** Where children leave the establishment ensure their child protection file is provided (with a receipt obtained) for any new establishment as soon as possible but transferred separately and securely from the main pupil file.

## **The Management Committee's Roles & Responsibilities**

**6.1** Members of the Management Committee should read, understand and apply their statutory responsibilities described in Keeping Children Safe in Education (Sept 2025) with regards to policies, procedures and training that comply with the law at all times.

**6.2** A senior member of staff must be appointed to take leadership responsibility for Newhaven's safeguarding arrangements. This designated safeguarding lead must have the role explicitly mentioned in their job description.

**6.3** The Management Committee should ensure there are appropriate policies and procedures in place in order for appropriate action to be taken in a timely manner to safeguard and promote children's welfare. This includes an effective child protection policy, and a staff code of conduct which includes staff/pupil relationships and communications including the use of social media.

**6.4** The Management Committee should ensure that all staff members undergo safeguarding and child protection training (including CPOMS training) at induction and at least annually and that they refer

to Looked after Children so staff have the information and skills they need. The training should be in line with advice from the Greenwich Safeguarding Children's Partnership (GSCP)

**6.5** In addition all staff members should receive regular safeguarding and child protection updates as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.

**6.6** The Management Committee should ensure that opportunity is provided for staff to contribute to and shape safeguarding arrangements and child protection policy.

**6.7** The Management Committee should ensure children are taught about safeguarding, including online, through teaching and learning opportunities, as part of providing a broad and balanced curriculum.

**6.8** The Management Committee should ensure appropriate safeguarding responses to children who go missing from education, particularly on repeat occasions, are in place to help identify the risk of abuse, neglect and exploitation including sexual abuse or exploitation and to help prevent the risks of their going missing in future.

**6.8a** The Management Committee should ensure there are robust systems in place for the induction of new staff on the school's safeguarding procedures and relevant policies (CP/ Use of CPOMS/ Behaviour Policy/ Staff Code of Conduct/ CMI and the role of the DSL) The Management Committee should ensure that this is reflected clearly in the Attendance Policy and safeguarding concerns are raised in relation to periods of absence.

**6.9** The Management Committee should ensure that, as part of the requirement for staff to undergo regularly updated safeguarding training and the requirement to ensure children are taught about safeguarding, including online, that online safety training for staff is integrated, aligned and considered as part of the overarching safeguarding approach.

**6.10** To ensure that all guidance relating to the safer recruitment of staff in Keeping Children Safe in Education (Sept 2025) is in place in Newhaven and that all appointment panels have at least one member who has received safer recruitment training.

**6.10a** The Management Committee should ensure that whistleblowing policy/ procedures are in place to encourage any staff member or volunteer to report concerns regarding safeguarding practice in schools

**6.11** The Management Committee should ensure there are procedures in place to handle allegations against teachers, the Head Teacher, volunteers and other staff. Such allegations should be referred to the local authority by the appropriate person. A member of the Management Committee (usually the chair) is nominated to be responsible for liaising with the Local Authority Designated Officer (LADO) in the event of allegations of abuse being made against the Head Teacher

**6.12** The Management Committee must ensure that the school makes a referral to the Disclosure and Barring Service (DBS) if a person in regulated activity has been dismissed or removed due to safeguarding concerns, or would have been had they not resigned. This is a legal duty and failure to refer when the criteria are met is a criminal offence.

**6.13** The Management Committee should ensure this child protection policy includes procedures to minimise the risk of child on child abuse and sets out how allegations of child on child abuse will be investigated and dealt with. The policy should reflect the different forms child on child abuse can take, make clear that abuse is abuse and should never be tolerated or passed off as “banter” or “part of growing up”. It should be clear as to how victims of peer on peer abuse will be supported.

**6.14** The Management Committee should ensure that the child on child abuse element of this policy should include procedures for dealing with sexting and upskirting ( Voyeurism (Offences) Act 2019)

**6.15** The Management Committee should ensure that all processes to deal with CP concerns have the interests and the wishes of the child at their heart.

**6.16** They should also ensure that a person with the appropriate skills is appointed as designated teacher for Looked After Children or CIOC (Child in our Care) and that they liaise with the virtual head for LACs to ensure that additional funding is best used to meet these children’s needs.

**6.17** Procedures are in place for regular evaluation of the effectiveness of the safeguarding system, including the adherence to safer recruitment practices and checks on the effectiveness of online safety (including filtering strategies) as outlined in KCSIE 2025.

### **The Role & Responsibilities of all Staff within School (including volunteers)**

**7.1** All staff (from henceforth including volunteers) have a responsibility to provide a safe environment in which children can learn.

**7.2** All school and college staff should be prepared to identify children who may benefit from early help (see above). This means they must discuss concerns with a member of the pastoral team as soon as they emerge in a child’s life.

**7.3** Any staff member who has a concern about a child’s welfare should follow the referral processes set out in this policy and the leaflet ‘Newhaven School- Safeguarding and Child Protection Procedures’. Staff may also be required to support social workers and other agencies following any referral.

**7.4** All staff must be aware of, understand and follow the child protection procedures within Newhaven School. To ensure this they must read, understand and follow:

- The Child Protection Policy
- Keeping Children safe in Education Part 1 (Sept 2025)
- What to do if you are worried a child is being Abused (March 2015)
- The Staff Code of Conduct
- The Behaviour Policy
- Educational Visits Policy

Copies of these documents are available on the school website and the staff shared area in the folder ***shared within the Safeguarding Google Drive Folder (Staff Essentials )***

**7.5.** All staff members should attend appropriate safeguarding and child protection training (including CPOMS) which is updated at least annually as well as being part of induction for new staff. If this is not

the case, you should arrange a time for this training with the DSL within your first week of employment.

**7.6** At Newhaven, staff will not normally make a direct referral to children's social care but this may happen in extremely rare circumstances (see referral procedures below). As a result, all staff should be aware of the process for making referrals to children's social care. If staff do make a referral, they must inform the safeguarding lead as soon as possible.

**7.7** All staff should know what to do if a child tells them he/she is being abused or neglected. This includes maintaining appropriate confidentiality and liaison with appropriate professionals. Staff should never promise confidentiality (see below).

**7.8** Any concern that may mean a child is at risk of harm **must** be reported to the DSL, Deputy DSL or pastoral team staff before that child leaves the school premises for the day in person.

**7.9** All staff members should be aware of the types of abuse, neglect and exploitation so that they are able to identify cases of children who may be in need of help or protection. Types of abuse, neglect and exploitation identifying signs are described in KCSIE (2025) and 'What to do if you are worried a child is being abused'. The four categories of abuse are as follows:

**Neglect**

**Physical abuse**

**Sexual abuse**

**Emotional abuse**

**7.10** Staff must maintain an attitude of 'it could happen here' and not allow the high levels of risk and risk taking behaviours of our students become normalised to them. Staff should be 'curious' and seek insight around disclosures or comments

**7.11** All concerns and discussions raised by staff must be followed up in writing to the DSL using CPOMS and the appropriate team alerted. A record of any bruises, cuts or marks described on a child should be made on a body map within CPOMS.

**7.12** If a teacher discovers that an act of Female Genital Mutilation (FGM) appears to have been carried out on a girl under the age of 18 then they must report this to the police. This should be done in consultation with the DSL. The Department for Education's Keeping Children Safe in Education explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs". FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'. Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in appendices.

**Any teacher** who discovers (either through disclosure by the victim or visual evidence) that an act of FGM appears to have been carried out on a **pupil under 18** must immediately report this to the police, personally. This is a statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

**Any other member of staff** who discovers that an act of FGM appears to have been carried out on a **pupil under 18** must speak to the DSL and follow our local safeguarding procedures.

The duty for teachers mentioned above does not apply in cases where a pupil is *at risk* of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine pupils.

**Any member of staff** who suspects a pupil is *at risk* of FGM or suspects that FGM has been carried out or discovers that a pupil **aged 18 or over** appears to have been a victim of FGM] must speak to the DSL and follow our local safeguarding procedures.

### 7.13 If you have concerns about extremism/ radicalisation or susceptibility to extremism.

If a child is suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action.

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include [Channel](#), the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team.

The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which school staff and governors can call to raise concerns about extremism with respect to a pupil. You can also email [counter.extremism@education.gov.uk](mailto:counter.extremism@education.gov.uk). Note that this is not for use in emergency situations. In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

- Think someone is in immediate danger
- Think someone may be planning to travel to join an extremist group
- See or hear something that may be terrorist-related

### 7.14 If you have a mental health concern

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Staff should be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one. All staff have an important role to play in supporting the mental health and well-being of pupils and identifying safeguarding concerns. (Also see *DFE Mental Health and Behaviour*) If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following Newhaven safeguarding steps and alerting the DSL.

If you have a mental health concern that is **not** also a safeguarding concern, speak to the DSL to agree a course of action.

### 7.15 Peer on Peer Abuse and allegations of abuse made against other pupils

This policy recognises that children are capable of abusing their peers. Staff are aware that any allegations will be investigated appropriately when they report concerns to the DSL and will never be tolerated or passed off as "banter" or "part of growing up". All victims will be taken seriously and offered appropriate support, regardless of where the abuse takes place. Any form of inappropriate touching or evidence of initiation procedures, sexting and upskirting (or other inappropriate use of new technology) will be followed up robustly.

Newhaven School recognises that peer on peer abuse can take many forms, including but not limited to:

- bullying, including cyberbullying
- physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- sexual violence and sexual harassment
- 'upskirting', which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- nude or semi-nude image or video sharing (also known as 'sexting' or youth produced/involved sexual imagery)
- initiation/hazing type violence and rituals
- abuse in intimate personal relationships between peers.

Staff should follow the procedures above for any disclosures of peer on peer abuse or any concerns that this might be happening.

Staff and leadership recognise that that some peer on peer abuse issues may be affected by gender, age, ability and culture of those involved, (i.e. for gender based abuse, girls are more likely to be victims and boys more likely to be perpetrators) however, all peer on peer abuse is unacceptable and all reports will be taken seriously.

In order to minimise the risk of peer-on-peer abuse, the school will:

- implement robust behaviour and anti-bullying policies,
- provide an age and ability appropriate RHSE curriculum,
- provide a range of reporting mechanisms ( eg tutor/ mentor/ trusted adult)
- challenge any form of derogatory or sexualised language or behaviour, including requesting or sending sexual images
- be vigilant to issues that particularly affect different genders – for example, sexualized or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- ensure our curriculum helps to educate pupils about appropriate behaviour and consent
- ensure pupils know they can talk to staff confidentially by [insert your procedures for making pupils aware of this here]
- ensure staff are trained to understand that a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy

All of the above should be considered in light of our existing Relationships Policy and Sexual Harassment Policy (see updates)

Victims of peer on peer abuse will be supported as for any other form of abuse in their best interests. All allegations of peer on peer abuse will be recorded, investigated, and dealt with in line with associated policies, including child protection, anti-bullying and behaviour.

Alleged victims, perpetrators and any other child affected by peer on peer abuse may be supported by:

- being listened to and being heard, with reports taken seriously.
- Victim blaming will be avoided and appropriate pastoral support will be provided, including access to the academy counsellor.

If required, educational approaches may be reviewed and police and/or MASH informed.

KCSIE 2025 also recognises that children may not feel ready or know how to tell someone they are being abused - all staff should be alert to the signs of abuse - If a pupil makes an disclosure or allegation of abuse against another pupil the following should be adhered to;

- You must record the allegation and tell the DSL, but do not investigate it
- The DSL will contact the local authority children’s social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate

### **7.16 Nude and/or Semi-Nude Image Sharing by Children**

Newhaven School recognises that nude and semi-nude image sharing (also known as youth produced/involved sexual imagery or “sexting”) is a safeguarding issue; all concerns will be reported to and dealt with by the DSL (or deputy).

When made aware of concerns involving nude or semi-nude image taking/sharing involving children, staff are advised to:

Report any concerns involving nude or semi-nude image sharing involving children to the DSL immediately.

- Never view, copy, print, share, store or save the imagery, or ask a child to share or download it – this may be illegal. If staff have already viewed the imagery by accident (e.g. if a child has shown it to them), this will be immediately reported to the DSL.
- Do not delete the imagery or ask the young person to delete it.
- Do not say or do anything to blame or shame any children involved.
- Explain to child(ren) involved that they will report the issue to the DSL and reassure them that they will receive appropriate support and help.
- Not ask the child or children involved in the incident to disclose information regarding the imagery and not share information about the incident with other members of staff, the child(ren) involved or their, or other, parents and/or carers. This is the responsibility of the DSL.

DSLs will respond to concerns as set out in the non-statutory UKICS guidance: Sharing nudes and semi nudes: advice for education settings working with young people (2020)

### **Initial review meeting**

The DSL will hold an initial review meeting with appropriate staff and will speak with the children involved if appropriate.

This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to pupil(s)
- If a referral needs to be made to the police and/or children's social care
- If it is necessary to view the imagery in order to safeguard the young person (in most cases, imagery should not be viewed)
- What further information is required to decide on the best response
- Whether the imagery has been shared widely and via what services and/or platforms (this may be unknown)
- Whether immediate action should be taken to delete or remove images from devices or online services
- Any relevant facts about the pupils involved which would influence risk assessment
- If there is a need to contact another school, college, setting or individual
- Whether to contact parents or carers of the pupils involved (in most cases parents should be involved)

A referral will be made to MASH and/or the police immediately if:

- the incident involves an adult (over 18).
- there is reason to believe that a child has been coerced, blackmailed or groomed, or there are concerns about their capacity to consent (for example, age, SEND).
- the image/videos involve sexual acts and a child under the age of 13, depict sexual acts which are unusual for the child's developmental stage, or are violent.
- a child is at immediate risk of harm owing to the sharing of nudes and semi-nudes.

DSLs will respond to concerns as set out in the non-statutory UKICS guidance: Sharing nudes and

semi nudes: advice for education settings working with young people (2020)

All decisions will be recorded in line with our child protection procedures and will be based on the consideration of the best interests of any child involved. The DSL may choose to involve other agencies at any time if further information/concerns are disclosed at a later date.

### **Informing parents**

The DSL will inform parents at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the pupil at risk of harm.

### **Referring to the police**

If it is necessary to refer an incident to the police, this will be done through the Safer Schools Liaison Officer or by calling the Emergency Services.

### **Recording incidents**

All sexting incidents and the decisions made in responding to them will be recorded via CPOMS. The record-keeping arrangements set out in this policy also apply to recording incidents of sexting.

## **7.17 Child on Child Sexual Violence or Harassment**

When responding to concerns relating to child on child sexual violence or harassment, the school will follow the guidance outlined in part five of KCSIE 2025 and the DfE guidance Sexual Violence and Sexual Harassment Between Children in Schools and Colleges (2021)

It is essential that all victims of sexual violence or sexual harassment are reassured that they are being taken seriously and that they will be supported and kept safe. A victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment or be made to feel ashamed for making a report. KCSIE also recognises that children may not feel ready or know how to tell someone they are being abused.

Immediate consideration will be given as to how best to support and protect the victim and the alleged perpetrator (and any other children involved/impacted).

When there has been a report of sexual violence or harassment, the DSL will make an immediate risk and needs assessment which will be considered on a case-by-case basis. The risk and needs assessment will be recorded and kept under review and will consider the victim (especially their protection and support), the alleged perpetrator, and all other children, adult students and staff and any actions that are required to protect them.

Reports will initially be managed internally by the school and where necessary will be referred to Integrated Children's Services and/or the Police. The decision making and required action taken will vary on a case by case basis, but will be informed by the wishes of the victim; the nature of the alleged incident (including whether a crime may have been committed); the ages and developmental stages of the children involved; any power imbalance between the children; if the alleged incident is a one-off or a sustained pattern of abuse; if there are any ongoing risks to the victim, other children, adult students or academy staff; and, any other related issues or wider context.

The Headteacher will provide data relating to sexual violence and harassment in the annual safeguarding report to the Management Committee

### 7.17 Online Safety

The following is only outlying information, for more detail about this area please see the **Online Safety Policy**

It is recognised by Newhaven School that the use of technology presents challenges and risks to children and adults both inside and outside of school. Newhaven School will empower, protect and educate the community in their use of technology and establish mechanisms to identify, intervene in, and escalate any incident where appropriate. The DSL has overall responsibility for online safeguarding and understanding the monitoring and filtering mechanisms in place within the school but will liaise as necessary with other members of staff.

Newhaven School identifies that the breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:

- **Content** - being exposed to illegal, inappropriate or harmful material, for example, pornography, fake news, racist or radical and extremist views
- **Contact** - being subjected to harmful online interaction with other users, for example, commercial advertising as well as adults posing as children or young people
- **Conduct** - personal online behaviour that increases the likelihood of, or causes, harm, for example, making, sending and receiving explicit images, or online bullying.
- **Commerce**

Newhaven School recognises the specific risks that can be posed by mobile technology, including mobile phones and cameras. In accordance with KCSIE 2025 has appropriate policies in place that are shared and understood by all members of the community. (see Online Policy/ Acceptable Use Policy and staff training)

Newhaven School will do all we reasonably can to limit children's exposure to online risks through our IT systems and we will ensure that appropriate filtering and monitoring systems are in place.

- If learners or staff discover unsuitable sites or material, they are required to inform the DSL or Deputy DSLs immediately.
- All users will be informed that use of our systems can be monitored, and that monitoring will be in line with data protection, human rights and privacy legislation.
- Filtering breaches or concerns identified through our monitoring approaches (including will be recorded and reported to the Headteacher and IT Services team.
- Any access to material believed to be illegal will be reported immediately to the appropriate agencies, including the police.
- When implementing appropriate filtering and monitoring, the school will ensure that "over blocking" does not lead to unreasonable restrictions as to what children can be taught with regards to online teaching and safeguarding.

Newhaven School acknowledges that whilst filtering and monitoring is an important part of online safety responsibilities, it is only one part of our approach to online safety.

- Learners will use appropriate search tools, apps and online resources as identified following an informed risk assessment.
- Learners will be directed to use age appropriate online resources and tools by staff.

Newhaven School recognises the emerging safeguarding risks associated with **artificial intelligence (AI), deepfake technology, and the spread of false or misleading information**. Students are educated on how to critically evaluate digital content, recognise potential online harms, and protect themselves from manipulation or exploitation in line with our **online safety and RSHE curriculum**.

Newhaven School will build a partnership approach to online safety and will support parents/carers to become aware and alert by:

- providing information on our website and through existing communication channels, such as newsletters and resources and the online platforms

Newhaven School will ensure that online safety training for all staff is integrated, aligned and considered as part of our overarching safeguarding approach.

The DSL will respond to online safety concerns in line with the child protection and other associated policies such as anti-bullying and behaviour.

- Internal sanctions and/or support will be implemented as appropriate.
- Where necessary, concerns will be escalated and reported to relevant partner agencies in line with local policies and procedures.

#### **Where children are asked to learn online at home in response to a full or partial closure:**

- Newhaven School will ensure any remote sharing of information, communication and use of online learning tools and systems will be in line with privacy and data protection requirements.
- All communication with learners and parents/carers will take place using Newhaven School provided or approved communication channels. See Online Safety Policy and Acceptable Use Policy.
- Staff and learners will engage with remote teaching and learning in line with existing behaviour principles as set out in Acceptable Use Policy for Remote Learning and Online Communication.
- Staff and learners will be encouraged to report issues experienced at home and concerns will be responded to in line with our child protection and other relevant policies.
- Parents/carers will be made aware of what their children are being asked to do online, including the sites they will be asked to access..
- Parents/carers will be encouraged to ensure children are appropriately supervised online and that appropriate parent controls are implemented at home.

#### **Curriculum and Staying Safe**

**7.18** Newhaven School will ensure that children are taught about safeguarding, including online safety, as part of providing a broad and balanced curriculum. We recognise that the school plays an essential role in helping children to understand and identify the parameters of what is appropriate child and adult behaviour; what is 'safe'; to recognise when they and others close to them are not safe; and how to seek advice and support when they are concerned.

Our curriculum provides opportunities for increasing self-awareness, self-esteem, social and emotional understanding, assertiveness and decision making so that learners have a range of age appropriate contacts and strategies to ensure their own protection and that of others. Newhaven School also recognises the emerging safeguarding risks associated with artificial intelligence (AI), deepfake technology, and the spread of false or misleading information.

The school is aware of the most recent communication from the DfE on the mandatory implementation of Relationships Education, Relationships and Sex and Health Education and will ensure that this is embedded into the curriculum.

Our school systems support children to talk to a range of staff. Children will be listened to and heard, and their concerns will be taken seriously and acted upon as appropriate.

**7.19** All staff and volunteers have a duty to raise concerns about poor or unsafe practice and potential failures in the school's safeguarding regime. Where a staff member feels unable to raise an issue or feels that their genuine concerns are not being addressed, other whistleblowing channels are open to them:

*The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)*

### **Embedding High Standards of Behaviour**

The school's Relationships Policy promotes positive and respectful behaviour of staff and pupils.

**7.21** All school staff have been trained to challenge any child-on-child abuse in all its forms.

- Staff will challenge derogatory or sexualised language and inappropriate behaviours including that carried out online.
- Deliver a curriculum to educate children about appropriate behaviour and developing positive relationships
- Staff will tackle prejudice and promote empathy through awareness and acceptance of differences. A whole school approach will be adopted to tackling sexism and challenging homophobic language, banter and racist language.
- Staff will be vigilant concerning all forms of bullying physical, emotional and verbal.

### **Royal Greenwich Guidance**

**8.1** School staff, parents and young people seeking further advice and guidance on a wide range of issues relating to safeguarding children and child protection (including procedures and protocols for Greenwich) can find it at the Greenwich Safeguarding Children's Partnership website by following the link below.

[www.greenwichsafeguardingchildren.org.uk](http://www.greenwichsafeguardingchildren.org.uk)

### **When to be concerned**

**8.2** There are two times when staff or volunteers should be concerned. One is when a child has disclosed some kind of abuse or concern such that it is a risk that a child is being abused or is at risk of abuse and action needs to be taken immediately. The other is when staff or volunteers have a concern over time that all is not right with a child. They may not be able to pin down exactly what the problem is but should raise the concern all the same.

**8.3** All staff and volunteers must be aware that the main categories of abuse are and the indicators and signs of abuse:

**Abuse** is a form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.

**Neglect** is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Appendix 1 defines neglect in more detail.

The four categories of abuse are as follows:

- **Neglect**
- **Physical abuse**
- **Sexual abuse**
- **Emotional abuse**

The following 3 safeguarding partners are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- The local authority (LA)
- A clinical commissioning group for an area within the LA
- The chief officer of police for a police area in the LA area

**8.4** All staff and volunteers must act in accordance with this policy and refer to the DSL or deputy DSL if a child presents with indicators of abuse (see 'Keeping Children safe in Education 2025' and 'What to do if you think a child is being abused').

**8.5** Staff must be aware of the prevalence of peer on peer abuse. This may be verbal or physical in school but can also include all the categories of abuse outlined above. It may include, on line abuse, sexting and 'upskirting' (typically involves taking pictures under a person's clothing without their permission) which is now a classified criminal offence (Voyeurism (Offences) Act 2019)

**8.6** Staff must be aware of all types of equalities based abuse such as homophobia, racism and sexism. These must be challenged and reported appropriately and should not be passed off as 'banter' or 'part of growing up'.

### **Dealing with a Disclosure**

**9.1 (a)** If a child discloses that he or she has been abused in some way the member of staff should seek out the DSL or deputy DSL immediately. You should not cut off the child in mid flow but use the following guidelines if a child is disclosing to you:

#### ***Responding to a disclosure; Advice and guidance***

As a teacher receiving a disclosure first hand it is normal to feel overwhelmed and confused. So, care must be taken to remain calm and to show support to the child throughout the disclosure phase.

Sometimes children choose to disclose concerns through a third party such as a friend 'telling' on their behalf, or indirectly e.g. sounding out information and reaction by asking 'what if my friend.....?' If such concerns arise they should be taken equally seriously and be followed up with the DSL in the same manner as a direct disclosure. Children may also seek to disclose and share their experiences through drawings, writing and play. If concerns arise, it is appropriate to talk further with the child to allow wider discussion and clarification. This might involve inviting the child to 'tell me more about what is happening in your picture' / story / game".

The following guidelines will help lessen the risk of causing more trauma to the child and/or compromising a criminal investigation during the disclosure phase.

**Receive:** Listen to what is being said without displaying shock or disbelief. Accept what is being said and allow the child to speak without judgement and demonstrate that you are taking it seriously. Listen and reflect back, avoid any leading questions.

**Reassure:** Reassure the child, but only so far as is honest and reliable. Don't make promises that you can't be sure to keep, e.g. "everything will be all right now". Reassure the child that they did nothing wrong and that you take what is said seriously. Don't promise confidentiality – never agree to keep secrets.

Tell them that you will need to report it to a member of the Safeguarding Team whose job it is to protect children. Acknowledge how difficult it must have been to talk. It takes a lot for a child to come forward about abuse.

**React:** Listen quietly, carefully and patiently. Do not assume anything – don't speculate or jump to conclusions. Do not investigate, interrogate or decide if the child is telling the truth. Remember that an allegation of child abuse may lead to a criminal investigation, so don't do anything that may jeopardise a police investigation. Let the child explain to you in his or her own words what happened, but don't ask leading questions.

Communicate with the child in a way that is appropriate to their age, understanding and preference. This is especially important for children with disabilities and for children whose preferred language is not English. Do not ask the child to repeat what they have told you to another member of staff. Explain what you have to do next and whom you have to talk to.

**Record:** Make some very brief notes at the time and write them up in detail as soon as possible using the CPOMS System. Do not destroy your original notes in case they are required by a Court. Record the date, time, place, words used by the child and how the child appeared to you – be specific. Record the actual words used; including any swear words or slang. Record statements and observable things, not your interpretations or assumptions – keep it factual.

**Refer:** Refer directly to the named child protection officer or designated person in your organisation (as set out in the organisation's child protection policy). Please make sure you refer by the end of the working day - if a child is in immediate harm or danger they should not leave the site until a member of the Safeguarding Team has spoken with them. Do not discuss the case with anyone outside the child protection team this includes parents until directed by the DSL or member of the Safeguarding Team.

## **9.2 Further support for disclosures**

The following are examples of possible responses to a disclosure (relevant to Trauma Informed Approaches) opposed to these being compulsory responses:

"Thank you for bringing this to my attention, we need to discuss this further shall we go (safe space). Please be aware anything we discuss will be brought to the attention of SLT, this is to keep you and others safe. I will listen to you now"

"I am so sorry that this has happened and I believe you. We will take this seriously. We will do whatever we can to help you get the support you need"

"You did the right thing telling us about this. You are not to blame for this happening. We will do whatever we can to help you get the support you need and in order to do this and ensure you are safe, I will have to share this information with the designated safeguarding lead"

“I want to make you aware that If you share any information which tells me that yourself or a young person is in danger of being, or has been harmed, I do have to share that. However, if that is the case I will tell you that I am going to do so and who I will tell. I will not share information unless I am legally required to do so”

Do ask open questions like "Is there anything else that you want to tell me?"

### **9.3 Further advice on record keeping**

- The Safeguarding Team should maintain clear, concise and confidential records of concerns, action taken and outcome via the CPOMS system
- Ensure safe and secure transfer of records when a child leaves the school (ideally through CPOMS transfer)

Make records that are factual, accurate and relevant and avoid subjective judgements. It is not the school's responsibility to 'check out' what any child tells nor should any abuser be questioned. Please ensure that the following information is recorded:

- time, date, place and people who were present
- exact details of what was said the by the child and/or others (no interpretation or opinion)
- the child's emotional or physical condition
- details of the behaviour(s) causing concern and the context in which it occurred
- details of injuries, marks or bruises - the position of these must be marked on the appropriate body drawing and suitably annotated to provide further detail (number, length of marks, description of marks, colour of marks/bruises etc. via CPOMS
- Speak with the Designated Safeguarding Lead, and provide them with the signed, dated written record on CPOMS without delay. This must be before the end of the school day and before the child has left the school premises if any risk may be current.

**9.4** If staff or volunteers are concerned about a child over a period of time that all is not right with a child but have no specific disclosure or other evidence then they should discuss this as soon as possible with the DSL or deputy DSL and record on CPOMS

**9.5** The same approach to receiving a disclosure must be taken if the discloser is not the allegedly abused child but another child or an adult.

**9.6** When the DSL, or in his/her absence, the Deputy DSL, has been informed, he/she will make the decision whether or not to refer the concern to Social Care. The Multi Agency Safeguarding Hub (MASH) will be consulted when there is uncertainty about whether to refer. Referrals to the MASH can be made by other staff in an emergency situation where the DSL and Deputy DSL are not available. In the case of another member of staff making the referral, the DSL must be informed as soon as possible.

**9.6** Referrals will be made as soon as possible by telephone and the appropriate forms completed and sent at the same time (at longest 24 hours after the initial telephone referral)

**MASH Consultation Line Tel- 0208 921 2267 or MASH 0208 8921 3172 (if known to Social Care)**

LADO/Greenwich Safeguarding Coordinator for Schools on 0208 921 3930 or contact the LADO 07896781040) [Childrens-LADO@royalgreenwich.gov.uk](mailto:Childrens-LADO@royalgreenwich.gov.uk) or [childrens-Lado@royalgreenwich.gov.uk.cjsm.net](mailto:childrens-Lado@royalgreenwich.gov.uk.cjsm.net)

Further information <https://www.greenwichsafeguardingchildren.org.uk/wp-content/uploads/2020/03/LADO-leaflet-.pdf>

**Referrals to Children's Social Care** must be made to the **Multi Agency Safeguarding Hub (MASH)**

Tel 0208 921 3172.

**Emergency Duty Team** (out of office hours only): 020 8854 8888

Email: [mash-referrals@royalgreenwich.gov.uk](mailto:mash-referrals@royalgreenwich.gov.uk)

**Multi Agency Safeguarding Hub Children's Services' Safeguarding and Social Care,**  
1st Floor The Woolwich Centre,  
Wellington Street,  
Woolwich,  
London  
SE18 6HQ

### **9.7 Referral to Family and Adolescent Support Services (formerly Early Help)**

RBG FaAss supports children and families with emerging needs and promotes a shared responsibility to facilitate significant and sustained change in children's lives, building resilience, preventing and protecting children from harm. FaASS is focused on developing and breaking intergenerational cycles of poverty through working with children's parents/carers and families.

Staff are alert to the potential need for FaASS for a child who:

- is disabled and has specific additional needs, including certain medical needs
- has special educational needs
- is a young carer
- is showing signs of engaging in anti-social or criminal behaviour
- is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health, domestic violence
- is showing early signs of abuse and/or neglect.

Further information can be found from:

[www.greenwichsafeguardingchildren.org.uk](http://www.greenwichsafeguardingchildren.org.uk)

**FaASS consultation line** 0208 921 2267

[Mash-referrals@royalgreenwich.gov.uk](mailto:Mash-referrals@royalgreenwich.gov.uk)

## **Confidentiality**

**10.1** Safeguarding children raises issues of confidentiality that must be clearly understood by all staff /volunteers in school. All staff/volunteers in school have a responsibility to share relevant information about the protection of children with other professionals. The Data Protection Act (DPA) 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe. If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk

This sharing of information is outlined in the guidance 'Information sharing advice for practitioners providing safeguarding services to children, young people, parents and carers' (July 2018). It identifies seven golden rules for sharing information and reminds practitioners that the General Data Protection Regulation (GDPR), Data Protection Act 2018 and human rights law are not barriers to justified information sharing, but provide a framework to ensure that personal information about living individuals is shared appropriately.

**10.2** If a child discloses to a member of staff/volunteer and asks that the information is kept secret, it is important that the member of staff /volunteer tells the child in a manner appropriate to the child's age/stage of development that they cannot promise complete confidentiality – instead he/she must explain that he/she may need to pass information to other professionals to help keep the child or other children safe.

**10.3** Staff/volunteers who receive information about children and their families in the course of their work shall share that information only within appropriate contexts.

**10.4** If staff (including agency staff) are in any doubt about sharing information, they should speak to the designated safeguarding lead (or deputy)

## **Communication with Parents**

**11.1** Parents and carers will be made aware of the school/service policy through published information and in initial meetings with parents and carers of new children. Parents and carers will be informed that in certain circumstances there may be a need to contact other agencies without first notifying them. This decision will be made in partnership between Education Services and Social Care. It will be made clear that this is a legal obligation and not a personal decision.

**11.2** Parents must be informed of any decision to refer to social services unless it is considered that this will put the child at further risk. The decision on whether to inform parents and at which point in the process will be made by the DSL or deputy DSL.

**11.3** The Management Committee makes this policy available to parents, carers and children through the school website. A hard copy is also available on request.

## **Record Keeping**

**12.1** The completed forms/records will be kept for the duration of the child's school career and when a child changes school the forms/records will be forwarded to the Link Teacher at the receiving school or transferred electronically via CPOMS. The school will retain a receipt for the records signed by the receiving school.

**12.2** The information contained will be regarded as confidential. Any request for access to the information by non-Greenwich Safeguarding Children's Partnership Agencies (e.g. Solicitor, investigating agent) will be referred to the Head Teacher/DSL who is advised to seek legal advice before acting.

**12.3** Records should be kept in line with CPOMS and how to record Child Protection at Newhaven (including Internship Cohort)

#### **12.4** The Importance of Information Sharing

Keeping Children Safe in Education 2025 now also requires that those working with children and young people should record "all concerns, discussions and decisions made including the rationale for those decisions. These recordings should include instances where referrals were or were not made to another agency such as LA children's social care or the Prevent program etc."

Recording why you decided not to refer a matter to children's services may be as important as why you decided to do so. Recording the rationale for decisions even if that decision was to wait and monitor the situation, or not refer. This must be logged on CPOMS

### **Dealing with Allegations against School Staff: Whistleblowing (also see KCSIE Sept 2024 and 2025)**

**13.1** If staff members have concerns about another staff member, then this should be referred to the Head Teacher. Where there are concerns about the Head Teacher, this should be referred to the chair of the management committee.

**13.2** An concern is any information which indicates that a member of staff /volunteer may have:

- Behaved in a way that has, or may have, harmed a child
- Possibly committed a criminal offence against or in relation to a child
- Behaved towards a child or children in a way which indicates s/he would pose a risk of harm if they work regularly or closely with children.
- Behaved in a way contrary to the Staff code of conduct

**13.3** All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school's safeguarding regime and know that such concerns will be taken seriously by the senior leadership team.

**13.4** If a staff member feels unable to raise an issue through the procedures outlined above, or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them:

- General guidance at [www.gov.uk/whistleblowing](http://www.gov.uk/whistleblowing)
- The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday or email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

**13.5** This applies to any child the member of staff / volunteer has contact with in their personal, professional or community life.

**13.6** To reduce the risk of allegations, all staff and volunteers must be aware of safer working practice and follow the school's code of conduct.

**13.7** The person to whom an allegation is first reported should take the matter seriously and keep an open mind. S/he should not investigate or ask leading questions if seeking clarification; it is important not to make assumptions. Confidentiality must not be promised and the person must be advised that the concern will be shared on a 'need to know' basis only.

**13.8** Actions to be taken include making an immediate accurate, written record of the allegation using the informant's words – including time, date and place where the alleged incident took place, brief details of what happened, what was said and who was present. This record must be recorded on CPOMS, dated and immediately passed to the Head Teacher or chair of the management committee if the allegation is against the Head Teacher.

**13.9** The recipient of an allegation must not unilaterally determine its validity, and failure to report it in accordance with procedures is a potential disciplinary matter.

**13.10** The Head Teacher/ chair of the management committee will not investigate the allegation itself, or take written or detailed statements, but will assess whether it is necessary to refer the concern to the Local Authority Designated Officer (LADO) for Education:

**Telephone: 020 8921 3930**

**Email: [childrens-LADO@royalgreenwich.gov.uk](mailto:childrens-LADO@royalgreenwich.gov.uk)**

**13.11** If the allegation meets any of the four criteria set out in section 14.2 then the Head Teacher shall contact the LADO (Education) without delay, and provide the LADO with written confirmation of the allegation.

**13.12** The Head Teacher shall, as soon as possible, following briefing from the LADO inform the subject of the allegation.

**13.13** If there is an allegation or concerns raised against the Head Teacher, then the Chair of Management Committee will be contacted. The Chair of The Management Committee for this school is:

Joseph Turner-Wing [jturnerwing@charltonmanor.greenwich.sch.uk](mailto:jturnerwing@charltonmanor.greenwich.sch.uk)

**14.1** In the event of allegations or concerns against the Head Teacher the Chair of the Management Committee (or the Vice Chair) will contact the LADO, whose contact details are given above.

## **The Use of Premises by Other Organisations**

### **15.1**

Where services or activities are provided under the direct supervision or management of Newhaven staff, our existing arrangements for child protection, including this policy, will apply.

Where services or activities are provided separately by another body using the Newhaven premises, the Premises manager will seek written assurance that the organisation concerned has appropriate policies and procedures in place with regard to safeguarding children and child protection, and that relevant safeguarding checks have been made in respect of staff and volunteers.

If this assurance is not achieved, an application to use premises will be refused.

## **Security and checking the identity and suitability of visitors**

**16.1** All visitors will be required to verify their identity to the satisfaction of staff and to leave their belongings, including their mobile phone(s), in a safe place during their visit.

If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification.

Visitors are expected to sign the visitors' book and wear a visitor's badge.

Visitors to the school who are visiting for a professional purpose, such as educational psychologists and school improvement officers, will be asked to show photo ID and:

- Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
- The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an enhanced DBS check with barred list information has been carried out

All other visitors, including visiting speakers, will be accompanied by a member of staff at all times.

We will not invite into the school any speaker who is known to disseminate extremist views, and will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise pupils or staff.

**16.2** Newhaven School will not accept the behaviour of any individual (parent or other) that threatens security or leads others (child or adult) to feel unsafe. Such behaviour will be treated as a serious concern and may result in a decision to refuse access for that individual to the school site. If necessary support and advice will be sought from the Police and the school will assist them as required.

**16.3** All members of staff have a responsibility for maintaining awareness of buildings and grounds security and for reporting concerns that may come to light. Staff will be expected to adhere to any safety arrangements implemented because of Covid-19 restrictions if so required by Government guidance and protocols

## **Missing pupils**

**17.1** Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing, we will:

- Contact parents as soon as a child is identified as missing
- Contact appropriate external services (including MASH)
- Liaise with both parents and services throughout the missing period to return the child to an appropriate safe place.

**17.2** If a child is absent from education then a follow up telephone call should be made by pastoral leads, the receptionist or mentor to gather further information. Patterns of attendance should be monitored and analysed termly. Regular contact should be maintained with parent and recorded on CPOMS and a home visit arranged after a significant period of absence.

17.3 Where mental health is a contributory factor in relation to absence from school all outside agencies working with the child should be informed of absence and potential safeguarding concerns

### **Monitoring & Evaluation**

**18.1** The responsibility for ensuring that the Child Protection Policy and procedures are in place, available to parents and reviewed annually lies with the Management Committee. This policy will be reviewed in line with the timescale and details set out on the front cover.

### **List of related policies/procedures**

Anti-bullying policy

E-safety Policy

Acceptable use agreements

Behaviour and relationships Policy

Equalities Statement policy

Equality of Opportunity Policy

Medical Handbook

Safer Recruitment in schools (RBG Guidance)

Staff Code of Conduct

Positive handling/ Physical restraint (Guidance and Training)

Sex and Relationships Education Policy (SRE)

Attendance

Remote Learning Policy

Health and Safety Policies and procedures

## **Appendix 1: Types and Indicators of Abuse**

(to be read in conjunction with 'Keeping Children Safe In Education' KCSIE 2025 Part 1)

NB. This abbreviated guidance provides a useful reminder of the types and indicators of abuse but **MUST** be considered within the context of a comprehensive training programme and reference to relevant sections in KCSIE 2025 (Part 1 and Annex B). This guidance is not a substitute for more in-depth consideration of harm.

There are four categories of abuse, which may result in a child being placed on the Child Protection Register. They are:

- Physical Abuse
- Emotional Abuse
- Sexual Abuse
- Neglect

### **Definitions of child abuse**

'Child Abuse, neglect and exploitation' is a generic term encompassing all ill treatment of children, including serious physical and sexual assault as well as cases where the standard of care does not adequately support the child's health (physical or mental) or development needs. The impact of witnessing the ill treatment of others may also cause harm to the child. Children may be abused or neglected through the infliction of harm or through the failure to act to prevent harm.

Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Abuse can occur in families, institutions or community settings. The alleged perpetrator may be known or not known to the child. There are 4 broad categories of abuse which are used for the purposes of registration. These categories overlap and an abused child may suffer more than one type of abuse.

### **1. Physical Abuse**

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning or suffocating or any other act of causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Possible indicators of Physical Abuse - Some of these indicators would clearly suggest child abuse, whilst others, when combined, may suggest that a child is being abused:

- Unexplained injuries, including burns, particularly if they are recurrent
- Improbable excuses given to explain injuries
- Refusal to discuss injuries
- Untreated injuries
- Admission of punishment which seems excessive
- Bald patches
- Withdrawal from physical contact
- Arms and legs covered, even in hot weather
- Fear of returning home

- Fear of medical help
- Self-destructive tendencies
- Aggression towards others
- Running away

## 2. Emotional Abuse

Emotional abuse is the persistent emotional maltreatment of a child, such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone. It may involve

- conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person.
- not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate.
- feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction.
- seeing or hearing the ill-treatment of another (including witnessing domestic violence)
- serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.

Possible indicators of Emotional Abuse - Some of these indicators would clearly suggest child abuse, whilst others, when combined, may suggest that a child is being abused:

- Physical/ mental and/or emotional developmental lags
- Admission of punishment that appears excessive
- Over-reaction to mistakes
- Continual self-deprecation
- Sudden speech disorders
- Fear of new situations
- Inappropriate emotional responses to painful situations
- Neurotic behaviour e.g. thumb sucking, hair twisting, rocking
- Self-mutilation
- Fear of parents being contacted
- Extremes of passivity or aggression
- Drug/solvent abuse
- Running away
- Compulsive stealing or scavenging

## 3. Sexual Abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology

can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is known (in education) as peer-on-peer abuse.

Possible indicators of Sexual Abuse - Some of these indicators would clearly suggest child abuse, whilst others, when combined, may suggest that a child is being abused:

- Sudden changes in behaviour or in school performance
- Displays of affection in a sexual way, inappropriate to age
- Tendency to cling or need reassurance
- Regression to younger behaviour e.g. thumb sucking, acting like a baby, playing with discarded toys
- Complaints of genital itching or pain, or anal pain
- Distrust of a familiar adult, or anxiety about being left with a relative, babysitter or lodger
- Unexplained gifts or money
- Depression and withdrawal
- Apparent secrecy
- Bedwetting, daytime wetting and/or soiling
- Sleep disturbances, nightmares
- Chronic illness, e.g. throat infection, venereal disease or other STD \*
- Anorexia, bulimia
- Unexplained pregnancy
- Fear of undressing, e.g. for sport
- Phobias or panic attacks

#### **4. Neglect**

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Possible indicators of Neglect - Some of these indicators would clearly suggest child abuse, whilst others, when combined, may suggest that a child is being abused.

- Constant hunger
- Poor personal hygiene
- Constant tiredness
- Poor state of clothing
- Emaciation
- Frequent lateness or non-attendance at school
- Untreated medical problems
- Destructive tendencies
- Low self esteem
- Neurotic behaviour
- No social relationships
- Running away

- Compulsive stealing or scavenging

### **Additional safeguarding issues**

#### **Mental Health**

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Mental Health can also contribute to absence from school.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Education staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Schools and colleges can access a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following their child protection policy, and speaking to the designated safeguarding lead or a deputy.

#### **Honour Based Abuse**

So-called 'honour-based' abuse (HBA) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving honour, often involves a wider network or family or community pressure and can include multiple perpetrators.

#### ***FGM mandatory reporting duty***

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers along with regulated health and social care professionals in England and Wales, to report to the police where they discover that 'FGM appears to have been carried out on a girl under 18' .

Possible indicators of Female genital mutilation (FGM)

- Holiday requests made to school for significant lengths of time (Pre warning)
- Long periods of time away from the classroom during the day with bladder or menstrual problems
- Avoidance of P.E.
- Difficulty walking, sitting or standing
- Prolonged absences from school
- Noticeable behaviour changes
- Withdrawal
- Depression
- Recurrent Urinary Tract Infections (UTI) or complaints of abdominal pain
- Forced marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage.

Since February 2023, it's been **a crime to carry out any conduct whose purpose is to cause a child to marry before their 18th birthday, even if violence, threats or another form of coercion are not used**. This applies to non-binding, unofficial 'marriages' as well as legal marriages

The Forced Marriage Unit has published Multi-agency guidelines, with pages 75-80 focusing on the role of schools and colleges. School and college staff can contact the Forced Marriage Unit if they need advice or information. Contact: 020 7008 0151 or email: [fmu@fco.gov.uk](mailto:fmu@fco.gov.uk). See also Royal Borough of Greenwich Safeguarding Children Partnership website:

[www.greenwichsafeguardingchildren.org.uk](http://www.greenwichsafeguardingchildren.org.uk)

### **Domestic Abuse UPDATE**

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. The abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of these can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

Operation Encompass – helps police and schools to work together to provide emotional and practical help when children have experienced a domestic incident. The DSL will be notified of a domestic incident before the child arrives at school the following day and can therefore arrange appropriate support.

### **Children missing or absent from Education**

All children, regardless of their circumstances, are entitled to a full-time education which is suitable to their age, ability, aptitude and any special educational needs they may have. A child going missing from education is a potential indicator of abuse or neglect, which may include sexual abuse or exploitation and child criminal exploitation, including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, honour based abuse or risk of forced marriage. Staff should be aware of their school's unauthorised absence and children missing from education procedures.

The school must inform the local authority of any pupil who fails to attend school regularly, or has been absent without the school's permission for a continuous period of 10 school days or more, at such intervals as are agreed between the school and the local authority (or in default of such agreement, at intervals determined by the Secretary of State).

A child absent from Education should be considered one who is vulnerable to becoming a Child Missing in Education and appropriate follow up should be carried out, including regular review of attendance, increased contact with parent/ carer or a home visit identified.

## **Private fostering**

Private fostering is when a child under the age of 16 (under 18 for children with a disability) is provided with care and accommodation by a person who is not their parent, a person with parental responsibility for them or a relative in their own home

If a member of school staff suspects a child may be being privately fostered without formal arrangement it is important to notify Multi Agency Safeguarding Hub (MASH) Tel 0208 921 3172

## **Preventing Radicalisation**

### **Extremist ideology, radicalisation and terrorism**

Children and young people can suffer harm when exposed to extremist ideology which may be social, political or religious in presentation.

Children can be deemed 'susceptible' to extremism by engaging with views that are counter to British Values and Newhaven's values of equity. This harm can range from a child adopting or complying with extreme views which limits their social interaction and full engagement with their education, to children being groomed for involvement in violent actions.

**Extremism:** the vocal or active opposition to our fundamental British values. This also includes calling for the death of members of the armed forces.

**Radicalisation:** the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

Terrorism: an 'action that endangers or causes serious violence to a person; causes serious damage to property or seriously interferes or disrupts an electronic system'. The use or threat must be designed to influence government or intimidate the public to advance a political, religious or ideological cause.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many different ways and settings. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability for which an extremist or terrorist group may appear to provide an answer. Similarly, radicalisation can occur through different methods, such as social media or the internet. Staff should use their own judgement in identifying children at risk of radicalisation and report to the DSL, who may decide to make a Prevent referral.

**PREVENT DUTY** - Section 26 of the Counter-Terrorism and Security Act 2015 ("the CTSA 2015"), places a duty on schools to have due regard to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent duty. Paragraphs 57-76 of the Revised Prevent duty guidance: for England and Wales is specifically concerned with schools (but also covers childcare). It places the requirements on schools in four general themes: Risk assessment, working in partnership, staff training and IT policies

- Schools are expected to assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology. Staff should be able to demonstrate both a general understanding of the risks affecting children and young people in the area and an understanding of how to identify individual children who may be at risk of

radicalisation and what to do to support them. Schools should have clear procedures in place for protecting children at risk of radicalisation.

- The Prevent duty builds on existing local partnership arrangements and take into account the policies and procedures of the Local Safeguarding Children Partnership. Effective engagement with parents/the family should also be considered as they are in a key position to spot signs of radicalisation. It is important to assist and advise families who raise concerns and be able to point them to the right support mechanisms. Schools should also discuss any concerns in relation to possible radicalisation with a child's parents in line with the individual school's safeguarding policies and procedures, unless they have specific reason to believe that to do so would put the child at risk.
- Schools need to equip staff to identify children at risk of being drawn into terrorism and to challenge extremist ideas. Individual schools are best placed to assess the training needs of staff in light of their assessment of the risk to pupils at the school of being drawn into terrorism. As a minimum, schools should ensure that the DSL lead undertakes Prevent awareness training and is able to provide advice and support to staff on protecting children from the risk of radicalisation.
- Schools must ensure that children are safe from terrorist and extremist material when accessing the internet in schools.
- If a Prevent referral is passed to a multi-agency Channel Panel, then a member of school staff will attend (if asked) to help with any assessment of vulnerability.

### **Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)**

Both are forms of abuse that occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, or through violence/the threat of violence. Whilst the age of the child may be a contributing factor for an imbalance of power, there are a range of other factors that could make a child more vulnerable to exploitation, including sexual identity, cognitive ability, learning difficulties, communication ability, etc. Children can be exploited by adult males, females, individuals or groups or by other children (who themselves may be experiencing exploitation).

CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse, including via the internet. CSE can be a one-off occurrence and may happen without the child's knowledge, e.g. by sharing videos or images on social media.

Any child who has been coerced into engaging in sexual activities is being abused or exploited. This includes 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited, for example if they believe they are in a genuine, romantic relationship.

CCE is when children are forced or manipulated into participating in criminal activity. This can range from the transportation of drugs, weapons or money through county lines (see below) or being forced to work in the manufacture of drugs, forced to shoplift, committing vehicle crime or threatening/committing serious violence to others. Children can become trapped in a cycle of criminal activity, as perpetrators can threaten their families with violence or entrap and coerce the child into debt. The experiences of boy victims may be very different to those of girl victims.

## Possible indicators of CSE and CCE

- Having unaffordable/unexplained gifts or new possessions
- Going missing from home or care or coming home late
- Associating with other young people involved in exploitation
- Truancy, exclusion, disengagement with school, opting out of education altogether
- Changes in emotional well-being
- Drug or alcohol misuse
- Unexplained injuries

## Further indicators of CSE include

- Having older boyfriends or girlfriends
- Suffering from sexually transmitted infections, inappropriate sexual or sexualised behaviour or pregnancy

**County lines** are where gangs and organised criminal networks transport illegal drugs, both locally and across the UK. Children and vulnerable adults are exploited to move, store and sell drugs and transport money, sometimes from urban areas to suburban and rural areas, market/seaside towns. Offenders will often use coercion, intimidation and serious violence (including sexual violence and weapons) to ensure compliance of victims. There may also be a threat of violence to the victim and their families can be used to trap the victim in continued criminality.

Possible indicators of County line involvement (in addition to some of the indicator mentioned for CSE and CCE) include :

- Victim is missing from home and subsequently found in area away from home or in accommodation to which they have no connection
- As a victim or perpetrator of serious violence (e.g. knife crime)
- In possession of more than one phone and receiving multiple calls requesting movement of drugs or money

## **Child-on-child/ child on child abuse**

Children can abuse other children. This is generally referred to as child-on-child abuse, can take many forms and can happen both inside and outside of school and online. Downplaying certain behaviours, for example dismissing sexual harassment as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys” can lead to a culture of unacceptable behaviours, an unsafe environment for children and, in worst case scenarios, a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

Child on Child abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- abuse in intimate personal relationships between peers
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

- sexual violence such as rape, assault by penetration; sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence); causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- sexual harassment such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse. Sexual harassment is likely to violate a child's dignity, make them feel intimidated, degraded or humiliated.
- deliberately brushing against or interfering with someone's clothes (this may cross into sexual violence)
- displaying pictures, photos or drawings of a sexual nature
- consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm

Information regarding the definitions and signs of further safeguarding issues, including homelessness, modern slavery, cybercrime, children with family members in prison and children and the court system, etc. can be found in KCSIE 2023 Annex B

## Appendix 2 Statutory Guidance, Legislation and Advice:

Statutory Guidance, legislation and advice includes:

- [The Children Act 1989 and 2004 amendment](#)
- [The Education Act 2002 \(section 175\)](#)
- [The Education \(Pupil Information\) \(England\) Regulations 2005](#)
- [Keeping Children Safe in Education 2022](#)
- [Dealing with Allegations of Abuse Against Teachers and Other Staff](#)
- [Working Together to Safeguard Children 2023](#)
- [Sexual violence and sexual harassment between children in schools and colleges 2021](#)
- [Searching, screening and confiscation \(July 2022\)](#)
- [What to do if you're worried a child is being abused \(March 2015\)](#)
- [Information sharing advice for practitioners providing safeguarding services to children, young people, parents and carers \(July 2018\)](#)
- [Domestic Abuse Act 2021 updated July 22](#)
- [Designated teacher for looked-after and previously looked-after children \(February 2018\)](#)
- [UKCCIS Guidance: Sexting in schools and colleges, responding to incidents, and safeguarding young people \(2017\)](#)
- [Greenwich Safeguarding Children Partnership.](#)
- [Children Missing Education, September 2016](#)
- [Relationships Education, Relationships and Sex Education \(RSE\) and Health Education, April 2019](#)
- [NSPCC](#)
- [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children
- [Childcare \(Disqualification\) and Childcare \(Early Years Provision Free of Charge\) \(Extended Entitlement\) \(Amendment\) Regulations 2018](#)
- [The Equality Act 2010](#)
- [The Public Sector Equality Duty \(PSED\)](#)
- [Statutory guidance on the Prevent duty](#)

Other useful documents include:

[Inspecting Safeguarding in Early years Education and Skills](#)  
[RBG Interagency referral form](#)

### Appendix 3: Records and Referral (CPOMS)

#### 1. Record Keeping and Referral Guidance - The School must:

- Keep clear records based on observation and evidence, which separate fact, allegation, hearsay, opinion or unsubstantiated evidence and which clearly indicate decisions and actions taken
  - Keep Child Protection information in separate files (on CPOMS) by the designated teacher and will only be discussed with staff on a need-to-know basis. Staff need to know when a child is at risk and what plan has been decided by case conference, but may not need to know all the confidential details.
  - Ensure all records, notes and observations made by class staff as part of ongoing monitoring of children on the child protection register or causing concern, are kept securely/scanned and uploaded to the electronic system by the DSL. All documents must be dated and the person completing the form named.
  - Ensure all child protection conference minutes are stored in the confidential files kept by the Designated Safeguarding Lead.
2. Recording Concerns - Initial concerns, incidents or disclosure by a child must be reported to the DSL. Staff understand that some children may not feel confident in reporting concerns or may not have the language in which to do so. Staff need to create a safe space for the child to speak (this especially true for LGBT, EAL and SEND children who wish to share concerns)

A copy of a body map in **Appendix 5** should be used to record injuries/marks/bruises.

The following information must be recorded:

- time, date, place and people who were present
- exact details of what was said by the child and/or others (no interpretation or opinion)
- the child's emotional or physical condition
- details of the behaviour(s) causing concern and the context in which it occurred

Details of injuries, marks or bruises - provide detail including number, length of marks, description of marks, colour of marks/bruises etc. Staff to record other relevant details - including information about previous incidents which may not have been reported but now seem relevant.

The DSL or staff **as directed should continue to monitor for concerns and maintain a chronology of concern.**

#### 3. Recording a disclosure ( see policy guidelines)

#### 4. Referrals (see also flow chart)

The DSL must keep detailed, contemporaneous notes of:

- discussions with staff
- discussions with the child
- discussion with parents
- information provided to social services
- decisions taken (with times, dates and signed)

The designated teacher will confirm verbal and telephone referrals to social services in writing within 48 hours of the referral.

## Reports for Child Protection Conferences/Core Group Meetings

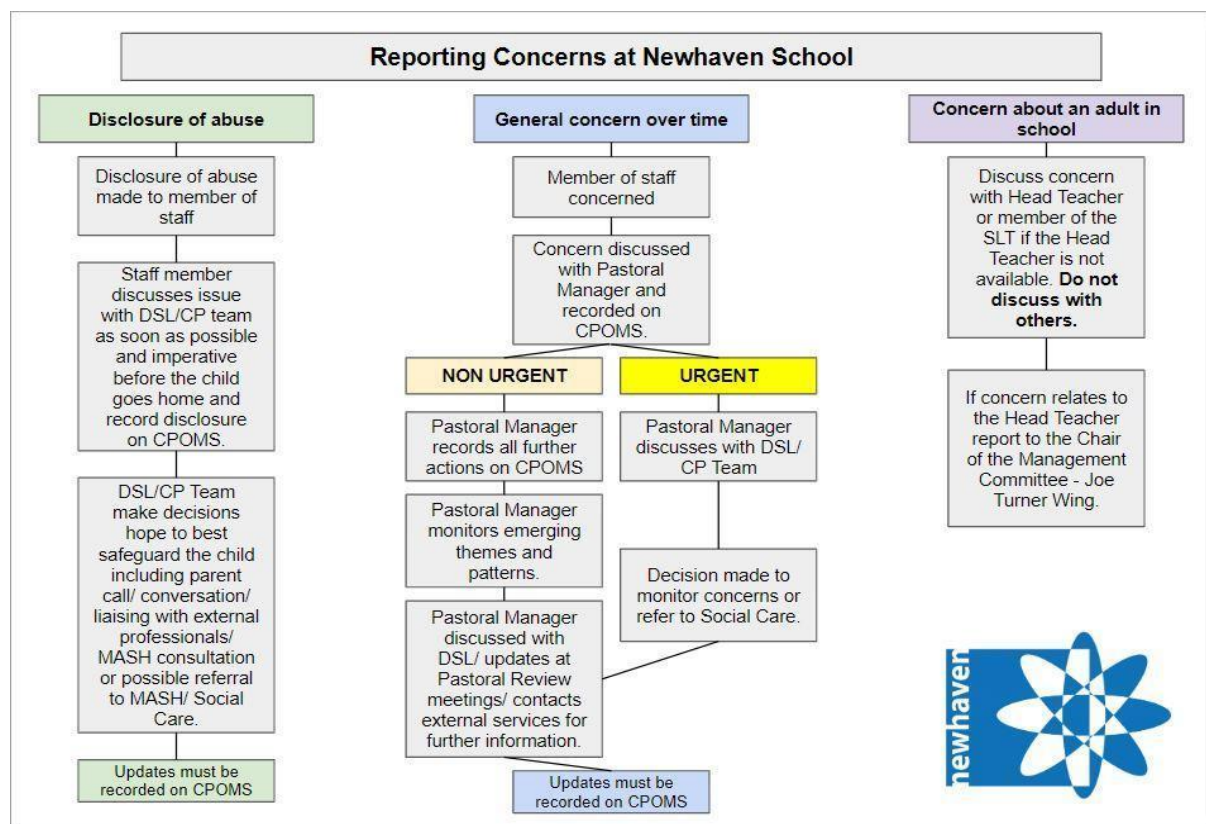
Reports for child protection conferences must be written on the agreed pro-forma. They should focus on the child's educational progress and achievements, attendance, behaviour, participation, relationships with other children and staff and, where appropriate, their appearance and concerns.

They should provide clear factual information. Staff should be aware that these reports will be made available to parents at the child protection conference.

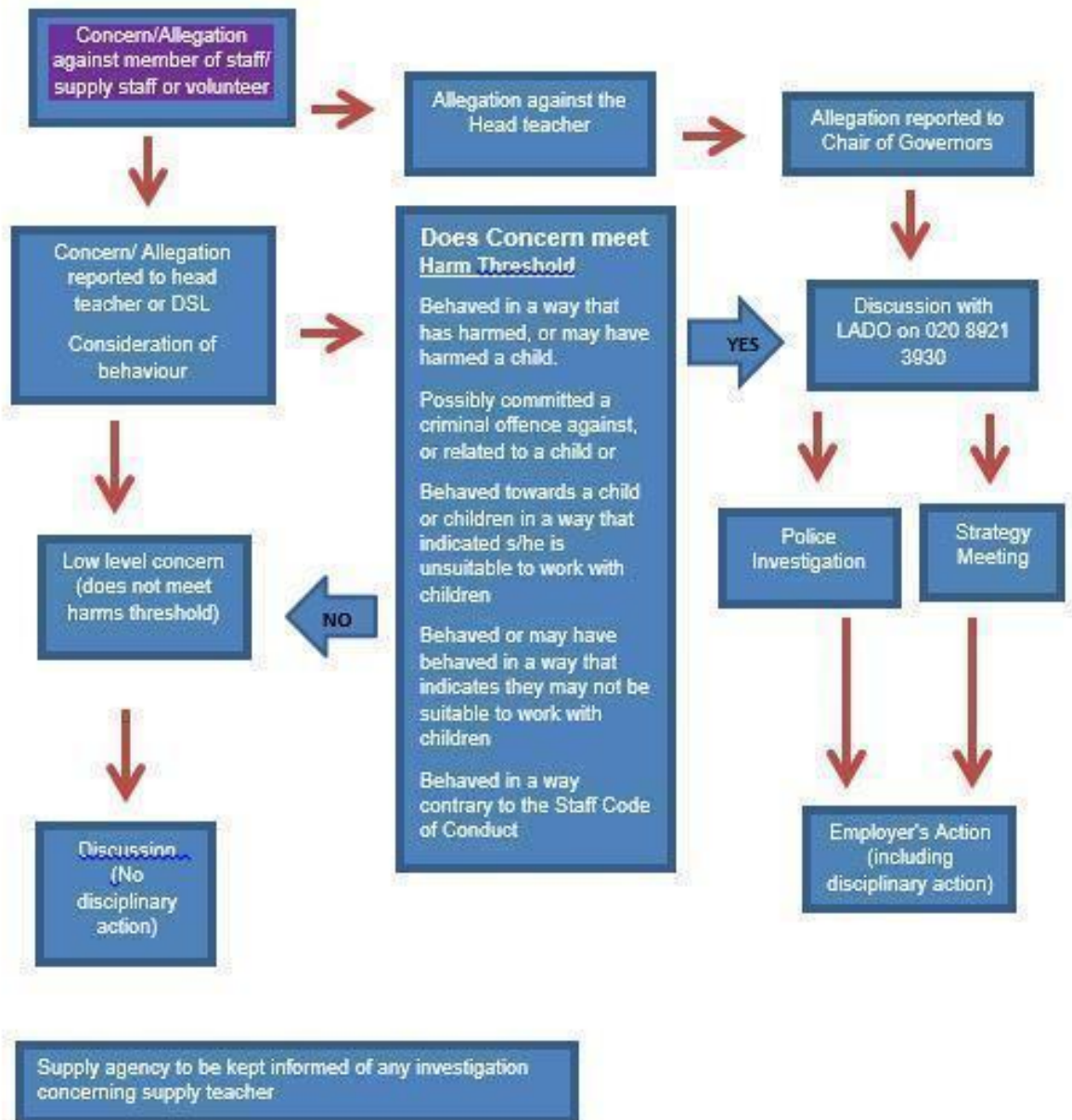
*If appropriate, the DSL should consider discussing the content of the report with the parent/carer in advance of any CP conference to help maintain a trusting and effective partnership.*

## Reporting concerns about a child

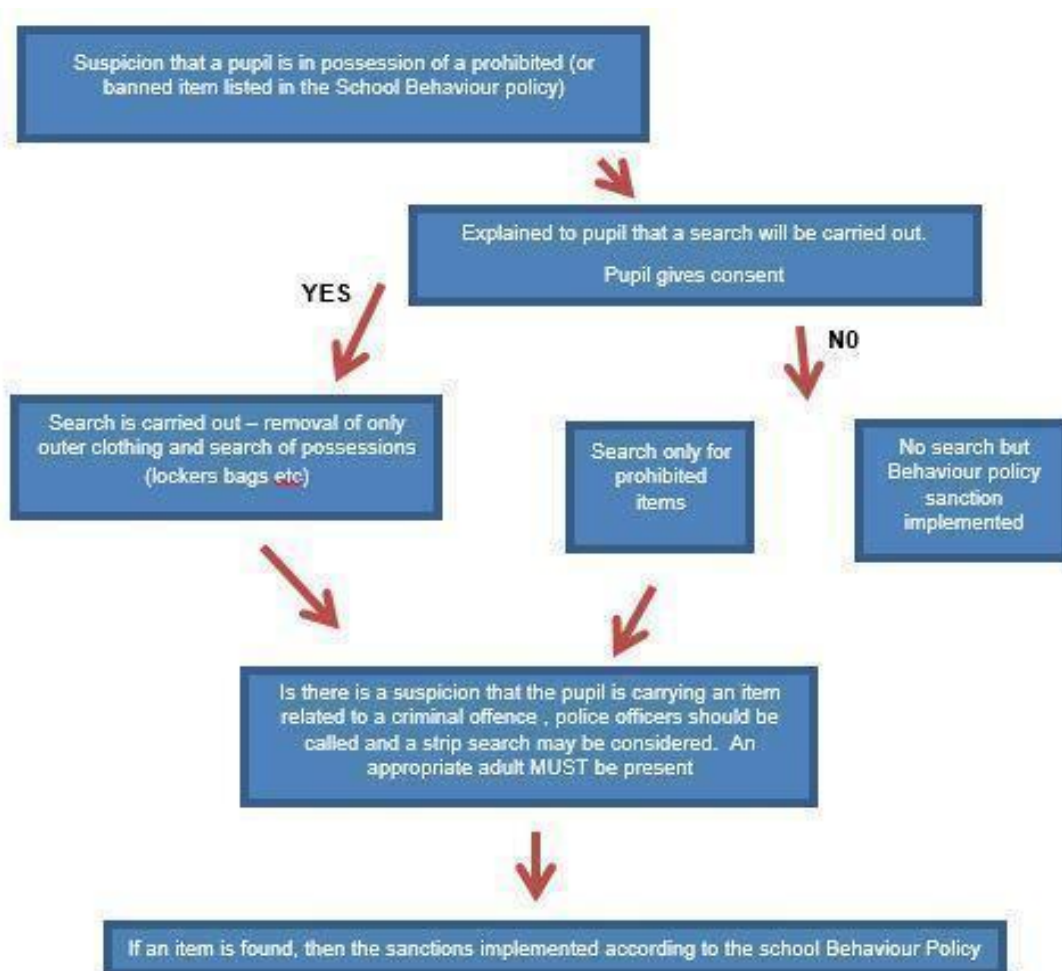
### Flow Chart for Reporting Concerns



**Appendix 4: Managing and Reporting Concerns or Allegations Against School Staff, Supply Staff, Volunteers and Contractors**



## Appendix 5: Searching pupils for prohibited and banned items



### Note:

- All searches should be carried out with pupil's permission if possible and should be undertaken by a member of staff who has been authorised to do so by the ~~headteacher~~.
- The person carrying out the search should be the same sex as the pupil and searches should be witnessed by a second adult member of staff.
- Searches will only require pupils to remove outer clothing (i.e., not worn wholly next to the skin or immediately over underwear).
- Strip searches can only be carried out by police officers. School staff should retain a duty of care/well-being for the pupil involved at all times.
- An appropriate adult must be present e.g., the parent/carer or a staff member (the school should facilitate the parent/carer as an appropriate adult if possible).
- Unless requested otherwise by the pupil, the appropriate adult should be the same sex as the pupil being searched.
- A record of all searches for prohibited items must be made by the DSL and the parents informed.

### Guidance:

*If there is a suspicion that the pupil is carrying an item related to a criminal offence, call the police. Do not investigate further. Police Officers attending may consider a more thorough search using their powers under the Police and Criminal Evidence Act (PACE). In these circumstances an Appropriate Adult MUST be made available for the pupil and must be present during this procedure.*

*An Appropriate Adult would not be required if the police are attending the school to support a child (pupil) who has reported a crime or is the victim of a crime. For example, police officers from the Child Abuse Investigation Team (CAIT), or the reporting of a street robbery where the pupil has been the victim of this act.*

See the KCSE 22 link When to call the police. Guidance for Schools and Colleges.

### **What is the aim of an appropriate adult?**

The role of the appropriate adult is to safeguard the interests, rights, entitlements and welfare of children and vulnerable people who are suspected of a criminal offence, by ensuring that they are treated in a fair and just manner and are able to participate effectively.

Here is how the law describes the role

"To safeguard the rights, entitlements and welfare of juveniles and vulnerable persons to whom the provisions of this and any other Code of Practice apply". *Police and Criminal Evidence Act 1984 Code C 1.7*

"To act as appropriate adults to safeguard the interests of children and young persons detained or questioned by police officers". *Crime and Disorder Act 1998 s.38(4)*

<https://www.appropriateadult.org.uk>